

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

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Attorneys for Defendant

SOUTHSTATE BANK, N.A.

incorrectly named herein as

ATLANTIC CAPITAL BANK

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

YOTTIAK GRAHAM,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES,
LLC and ATLANTIC CAPITAL BANK,

Defendants.

Case No. 2:24-cv-00308-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
SOUTHSTATE BANK, N.A.,
INCORRECTLY NAMED HEREIN AS
ATLANTIC CAPITAL BANK, TO
RESPOND TO PLAINTIFF'S
COMPLAINT
[FIRST REQUEST]**

Plaintiff YOTTIAK GRAHAM ("Plaintiff"), by and through his counsel George Haines, Esq. and Gerardo Avalos, Esq. of the FREEDOM LAW FIRM, LLC and Defendant SOUTHSTATE BANK, N.A., incorrectly named herein as ATLANTIC CAPITAL BANK ("Defendant SOUTHSTATE"), by and through its counsel Michael Ayers, Esq. and Alia Najjar, Esq., of QUINTAIROS, PRIETO, WOOD & BOYER, P.A., hereby stipulate as follows:

1. On February 13, 2024, Plaintiff filed his Complaint (ECF No. 1) in this matter.
2. On March 11, 2024, Plaintiff served the Summons and Complaint on Defendant SOUTHSTATE (ECF No. 9).
3. Defendant SOUTHSTATE had twenty-one (21) days from service of the

STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANT SOUTHSTATE BANK, N.A., INCORRECTLY NAMED HEREIN AS ATLANTIC CAPITAL BANK, TO RESPOND TO PLAINTIFF'S COMPLAINT - 1

1 Summons and Complaint (ECF No. 9) within which to respond to Plaintiff's Complaint (ECF
2 No. 1), i.e. April 1, 2024.

3 4. Counsel for Defendant SOUTHSTATE was only just retained to represent
4 Defendant SOUTHSTATE and requires additional time within which to formulate a defense in
5 this matter.

6 5. Counsel for Plaintiff was contacted and agreed to extend Defendant
7 SOUTHSTATE a 30-day extension of time within which to respond to Plaintiff's Complaint,
8 i.e. May 1, 2024.

9 6. Accordingly, Plaintiff and Defendant SOUTHSTATE hereby stipulate to extend
10 Defendant SOUTHSTATE's deadline to file its responsive pleading in this matter until and
11 including May 1, 2024.

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27 STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANT SOUTHSTATE BANK, N.A.,
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COMPLAINT - 2

1 This is the first stipulation for extension of time for Defendant SOUTHSTATE to
2 respond to Plaintiff's Complaint and is being made in good faith and not for the purpose of undue
3 delay. No additional requests for extensions are contemplated.

4 **IT IS SO STIPULATED.**

5 DATED this 28th day of March, 2024.

DATED this 28th day of March, 2024.

6 **FREEDOM LAW FIRM, LLC**

7 **QUINTAIROS, PRIETO, WOOD &
BOYER, P.A.**

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9 By: /s/ Gerardo Avalos
George Haines, Esq.
Gerardo Avalos, Esq.
8985 South Eastern Ave., Ste. 100
Las Vegas, NV 89123
10 *Attorneys for Plaintiff*
11 *YOTTIAK GRAHAM*

By: /s/ Michael Ayers
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Reno, NV 89509
12 *Attorneys for Defendant*
13 *SOUTHSTATE BANK, N.A.,*
14 *incorrectly named herein as*
15 *ATLANTIC CAPITAL BANK*

16 **ORDER**

17 The Stipulation to Extend Deadline for Defendant SOUTHSTATE BANK, N.A.,
18 incorrectly named herein as ATLANTIC CAPITAL BANK, to Respond to Plaintiff's Complaint
19 up to and including May 1, 2024, is so ORDERED AND ADJUDGED.

20 DATED: March 29, 2024

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24 UNITED STATES MAGISTRATE JUDGE
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27 STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANT SOUTHSTATE BANK, N.A.,
28 INCORRECTLY NAMED HEREIN AS ATLANTIC CAPITAL BANK, TO RESPOND TO PLAINTIFF'S
COMPLAINT - 3